

EXHIBIT E

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA
ORLICH; ALLISON GAMBA; and MARY
DE LUIS

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

No. 10-cv-06950 (AT)(RWL)

**PLAINTIFFS' SECOND AMENDED INITIAL
DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure ("Rule") 26(a)(1), Plaintiffs Christina Chen-Oster, Shanna Orlich, Allison Gamba, and Mary De Luis ("Plaintiffs"), through their undersigned counsel, provide the following Amended Initial Disclosures.

These Amended Initial Disclosures represent Plaintiffs' counsel's best efforts at this stage of the litigation to provide non-privileged, non-work product information and documents relating to Plaintiffs' claims, recognizing that fact investigation is ongoing. Plaintiffs reserve the right to rely on additional witnesses or documents to support their claims and/or to supplement these Amended Initial Disclosures as the case progresses, pursuant to Rule 26(e). Plaintiffs also reserve the right to rely on persons with knowledge identified in Defendants' Initial Disclosures and Amended Initial Disclosures.

In making these Amended Initial Disclosures, Plaintiffs do not waive their right to object to the production of any document or thing disclosed herein on the basis of any privilege, the work product doctrine, relevancy, undue burden, or any other objection.

I. Individuals—Rule 26(a)(1)(A)(i)

A. H. Cristina Chen-Oster

Witness Name and Contact Information	Subject of Substantive Information
Llyn Bank (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Matthieu Duncan (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Michael Dweck (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Mark Erickson (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Quincy Evans (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Ruth Ferris (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.

Eileen Fields (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Arup Ganguly (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Paul Germaine (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Rashmi Jolly (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Frank Leccesse (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Rob Lee (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Mark Leydecker (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Nina Lopez (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Ian McFadzen (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Will McFarren (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Steve McGuinness (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Donna Miller (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Yumiko Murakami (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.

Kaan Onur (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Silvia Owens (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Emily Price (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Michael Price (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Janet Rampulla (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Chris Roller (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Michael Ryan (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Dimple Sahni (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Eric Schwartz (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Jason Shea (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Andrew Stead (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Katalin Tischhauser (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Christina Um (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.

Maria Vogt (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Ted Wang (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Graham Ward (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Livia Wei (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Gregg Weinstein (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Oliver Will (address and phone number unknown)	Defendants' discriminatory practices and policies, Ms. Chen-Oster's work history, and Ms. Orlich's work history.
Elaine Yu (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.

B. Shanna Orlich

Witness Name and Contact Information	Subject of Substantive Information
David Alvillar (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Rohit Bansal (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Theodore Blake (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Justin Gmelich (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
David Goldman (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work

	history.
Allison Grover (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Paul Huchro (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Rob Incovaria (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Dennis Lafferty (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Coleen Mager (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Maybel Marte (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Justin McEvily (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Todd Pierce (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
John Schaffer (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Randy Shimanuki (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Justin Slatky (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Martin Teevan (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Tom Tormey (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.

Tom Wagner (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
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C. Allison Gamba

Witness Name and Contact Information	Subject of Substantive Information
Steve Aberman (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Paul Asmar (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Henry Becker (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Mark Dehnert (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Donald Himpele (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Neil Kaufman (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
John Lauto (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Christopher Magaro (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Matthew Mallgrave (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Paul Russo (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.
Michael Urizzo (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Gamba's work history.

D. Mary De Luis

Witness Name and Contact Information	Subject of Substantive Information
Thomas Fruge (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. De Luis's work history.
Ryan Isaacs (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies and Ms. De Luis's work history.
Andrew Kaiser (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. De Luis's work history.
David Sweezey (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies and Ms. De Luis's work history.

E. Class

Plaintiffs have certified class claims and may call as witnesses other current and former employees who have discoverable information relevant to those claims. This list includes, but is not limited to, the following individuals:

Witness Name and Contact Information	Subject of Substantive Information
Angela Abramian-Katz (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Rodney Adams (address and phone number unknown)	Defendants' discriminatory practices and policies.
Scott Lewis Albert (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Robert B. Ambalu (address and phone number unknown)	Defendants' discriminatory practices and policies.
Ralph J. Bamonte (address and phone number unknown)	Defendants' discriminatory practices and policies.
Gargi Banerjee (address and phone number unknown)	Defendants' discriminatory practices and policies.

Aaron Barnard (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Edson G. Barton (address and phone number unknown)	Defendants' discriminatory practices and policies.
Stacy Bash-Polley (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jon Beinner (address and phone number unknown)	Defendants' discriminatory practices and policies.
Avanish Bhavsar (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Lloyd Blankfein (address and phone number unknown)	Defendants' discriminatory practices and policies.
Adam Block (address and phone number unknown)	Defendants' discriminatory practices and policies.
Evan Boff (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Tom Bracco (address and phone number unknown)	Defendants' discriminatory practices and policies.
Erika Irish Brown (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Samantha Brown (address and phone number unknown)	Defendants' discriminatory practices and policies.
Anthony Campagna (address and phone number unknown)	Defendants' discriminatory practices and policies.
Thomas David Campbell (address and phone number unknown)	Defendants' discriminatory practices and policies.
David Cantor (address and phone number unknown)	Defendants' discriminatory practices and policies.
Val Carlotti (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
David E. Casner (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Leonard Chung (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.

Gary Cohn (address and phone number unknown)	Defendants' discriminatory practices and policies.
Chris Cole (address and phone number unknown)	Defendants' discriminatory practices and policies.
Christopher Paul Conlan (address and phone number unknown)	Defendants' discriminatory practices and policies.
Dusty Cooper (address and phone number unknown)	Defendants' discriminatory practices and policies.
Edith Cooper (address and phone number unknown)	Defendants' discriminatory practices and policies.
Tom Cornacchia (address and phone number unknown)	Defendants' discriminatory practices and policies.
Kathleen (Kate) Cupertino (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Jeff Daly (2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067)	Defendants' discriminatory practices and policies.
Somdip Datta (address and phone number unknown)	Defendants' discriminatory practices and policies.
Dan Dees (2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067)	Defendants' discriminatory practices and policies.
Kevin M. Dommenga (address and phone number unknown)	Defendants' discriminatory practices and policies.
Lisa Donovan (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Christina Drews (address and phone number unknown)	Defendants' discriminatory practices and policies.
Brian Duffy (address and phone number unknown)	Defendants' discriminatory practices and policies.
Patrick Morley Dunn (address and phone number unknown)	Defendants' discriminatory practices and policies.
Sergei N. Dzhosyuk (address and phone number unknown)	Defendants' discriminatory practices and policies.
Edward Eisler (address and phone number unknown)	Defendants' discriminatory practices and policies.

Issam Jean Taymour El Chammah (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jim Esposito (address and phone number unknown)	Defendants' discriminatory practices and policies.
J. Michael Evans (address and phone number unknown)	Defendants' discriminatory practices and policies.
Michael Evans (address and phone number unknown)	Defendants' discriminatory practices and policies.
Michael Fahey (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jean Fau (address and phone number unknown)	Defendants' discriminatory practices and policies.
Genevieve Felix (address and phone number unknown)	Defendants' discriminatory practices and policies.
Joseph Femenia (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Orlich's work history.
Ed Forst (address and phone number unknown)	Defendants' discriminatory practices and policies.
Linda Fox (address and phone number unknown)	Defendants' discriminatory practices and policies.
Casey Friedel (address and phone number unknown)	Defendants' discriminatory practices and policies.
Richard Friedman (address and phone number unknown)	Defendants' discriminatory practices and policies.
Henry Gerkens (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Gary Giglio (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Richard Gnodde (address and phone number unknown)	Defendants' discriminatory practices and policies.
Peter Grieve (address and phone number unknown)	Defendants' discriminatory practices and policies.
Maxim A. Grudin (address and phone number unknown)	Defendants' discriminatory practices and policies.

Sharleen Gutierrez (address and phone number unknown)	Defendants' discriminatory practices and policies.
Pavol Gvozdjak (address and phone number unknown)	Defendants' discriminatory practices and policies.
Ralph Haase (address and phone number unknown)	Defendants' discriminatory practices and policies.
Christopher Halstedt (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Mark Hancock (address and phone number unknown)	Defendants' discriminatory practices and policies.
Caroline Heller (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
David Heller (address and phone number unknown)	Defendants' discriminatory practices and policies.
Mac Heller (address and phone number unknown)	Defendants' discriminatory practices and policies.
Aime Hendricks (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Ken Hitchner (address and phone number unknown)	Defendants' discriminatory practices and policies.
Dane Holmes (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Peter C. Huang (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Edie Hunt (address and phone number unknown)	Defendants' discriminatory practices and policies.
Phil Hylander (address and phone number unknown)	Defendants' discriminatory practices and policies.
Toni Infante (address and phone number unknown)	Defendants' discriminatory practices and policies.
Dan Jick (address and phone number unknown)	Defendants' discriminatory practices and policies.
Weidong Jin (address and phone number unknown)	Defendants' discriminatory practices and policies.
Abigail Johnson ((415) 418 2900; address unknown)	Defendants' discriminatory practices and policies.

Aynesh Johnson (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Llewellyn S. Jones (address and phone number unknown)	Defendants' discriminatory practices and policies.
Kapil Kamdar (address and phone number unknown)	Defendants' discriminatory practices and policies.
Rob Kaplan (address and phone number unknown)	Defendants' discriminatory practices and policies.
Scott Kapnick (address and phone number unknown)	Defendants' discriminatory practices and policies.
Kevin Kennedy (address and phone number unknown)	Defendants' discriminatory practices and policies.
James P. Kenney (address and phone number unknown)	Defendants' discriminatory practices and policies.
Shahin Khezri (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Shane Kinahan (address and phone number unknown)	Defendants' discriminatory practices and policies.
Matthew Ross Knopman (address and phone number unknown)	Defendants' discriminatory practices and policies.
Christopher Kojima (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Joanna Kozlowski (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Peter Kraus (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jennifer Krevitt (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Jessica Kung (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
David Landman (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Eric Lane (address and phone number unknown)	Defendants' discriminatory practices and policies.
Brett A. Langbert (address and phone number unknown)	Defendants' discriminatory practices and policies.

Scott R. Lange (address and phone number unknown)	Defendants' discriminatory practices and policies.
Bruce Larson (address and phone number unknown)	Defendants' discriminatory practices and policies.
Gregg Lemkau (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Brad Levy (address and phone number unknown)	Defendants' discriminatory practices and policies.
Steve Lindia (address and phone number unknown)	Defendants' discriminatory practices and policies.
Edward M. Loggie (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Alex Lowen (address and phone number unknown)	Defendants' discriminatory practices and policies.
Blake Lyman (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Peter MacDonald (address and phone number unknown)	Defendants' discriminatory practices and policies.
Dan Mandell (address and phone number unknown)	Defendants' discriminatory practices and policies.
Monica Mandelli (address and phone number unknown)	Defendants' discriminatory practices and policies.
Scott Mehling (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Michael Garrett Mills (address and phone number unknown)	Defendants' discriminatory practices and policies.
Vahagn Minasian (address and phone number unknown)	Defendants' discriminatory practices and policies.
Eric Mindich (address and phone number unknown)	Defendants' discriminatory practices and policies.
Luciana Miranda (address and phone number unknown)	Defendants' discriminatory practices and policies.
Thomas Montag (address and phone number unknown)	Defendants' discriminatory practices and policies.
Brian Murphy (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Phil Murphy (address and phone number unknown)	Defendants' discriminatory practices and policies.

Joseph Thomas Murt (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Marc Nachmann (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jeffrey Nedelman (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
Duncan Neiderauer (address and phone number unknown)	Defendants' discriminatory practices and policies.
Shannon Michael Nelson (address and phone number unknown)	Defendants' discriminatory practices and policies.
John Butler Nixon (2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067)	Defendants' discriminatory practices and policies.
Timothy O'Neill (address and phone number unknown)	Defendants' discriminatory practices and policies.
Diana Pae (address and phone number unknown)	Defendants' discriminatory practices and policies.
Robert A. Palazzi (address and phone number unknown)	Defendants' discriminatory practices and policies.
Brian A. Pasquinelli (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Michael Sergei Perlov (address and phone number unknown)	Defendants' discriminatory practices and policies.
Joe Raso (address and phone number unknown)	Defendants' discriminatory practices and policies.
Aaron Robertson (address and phone number unknown)	Defendants' discriminatory practices and policies.
Tami Rosen (address and phone number unknown)	Defendants' discriminatory practices and policies.
Deke Rothfuss (address and phone number unknown)	Defendants' discriminatory practices and policies.
John Rustum (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
David Ryan (address and phone number unknown)	Defendants' discriminatory practices and policies.

Pablo Salame (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jason Savarese (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Joseph P. Scellato (address and phone number unknown)	Defendants' discriminatory practices and policies.
Bennett J. Schachter (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Susie Scher (address and phone number unknown)	Defendants' discriminatory practices and policies.
Clare Scherrer (address and phone number unknown)	Defendants' discriminatory practices and policies.
Cliff Schlessinger (1735 Market Streetm 26th Floor, Philadelphia, PA 19103)	Defendants' discriminatory practices and policies.
John Schrin (address and phone number unknown)	Defendants' discriminatory practices and policies.
Harvey Schwartz (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jennifer Scully (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Peter Seibold (address and phone number unknown)	Defendants' discriminatory practices and policies.
Michael Sherwood (address and phone number unknown)	Defendants' discriminatory practices and policies.
Abraham M. Shulman (address and phone number unknown)	Defendants' discriminatory practices and policies.
Andrew Silverman (address and phone number unknown)	Defendants' discriminatory practices and policies.
William Harold Skelton (100 Crescent Court, Suite 100, Dallas, Texas 75201)	Defendants' discriminatory practices and policies.
Gee Smith (address and phone number unknown)	Defendants' discriminatory practices and policies.
Radcliffe John Smith (address and phone number unknown)	Defendants' discriminatory practices and policies.

David Solomon (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Sergio Sotolongo (address and phone number unknown)	Defendants' discriminatory practices and policies.
Marc Spilker (address and phone number unknown)	Defendants' discriminatory practices and policies.
Tony Svach (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jonathan S. Taubin (address and phone number unknown)	Defendants' discriminatory practices and policies.
Megan Taylor (address and phone number unknown)	Defendants' discriminatory practices and policies.
Prasannaa Venkata Thati (address and phone number unknown)	Defendants' discriminatory practices and policies.
John Thurlow (address and phone number unknown)	Defendants' discriminatory practices and policies.
Suzette Unger (address and phone number unknown)	Defendants' discriminatory practices and policies.
Michael C. Urizzo (address and phone number unknown)	Defendants' discriminatory practices and policies.
Ashok Varadhan (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
Anilu Vazquez-Ubarri (address and phone number unknown)	Defendants' discriminatory practices and policies.
Christopher J. Viscardi (address and phone number unknown)	Defendants' discriminatory practices and policies.
John Waldron (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.
John Weinberg (address and phone number unknown)	Defendants' discriminatory practices and policies.
Howard Wietschner (address and phone number unknown)	Defendants' discriminatory practices and policies and Ms. Chen-Oster's work history.
John Willian (200 West Street, New York, NY 10282)	Defendants' discriminatory practices and policies.

William Reid Wilson (address and phone number unknown)	Defendants' discriminatory practices and policies.
Jon Winkelried (address and phone number unknown)	Defendants' discriminatory practices and policies.
Donna Winston (address and phone number unknown)	Defendants' discriminatory practices and policies.
Melinda Wolfe (address and phone number unknown)	Defendants' discriminatory practices and policies.
Kun Xia (7 Finance Street, 18th Floor, Xicheng District, Beijing 100033)	Defendants' discriminatory practices and policies.
Tucker York (address and phone number unknown)	Defendants' discriminatory practices and policies.
Matthew M. Zaifert (address and phone number unknown)	Defendants' discriminatory practices and policies.

Additionally, Plaintiffs may call as witnesses: (1) any individuals who submit declarations or testimony on behalf of Defendants or Plaintiffs in relation to any motion for decertification or summary judgment; (2) any individuals deposed by Defendants or Plaintiffs, including individuals designated by Defendants pursuant to Rule 30(b)(6); and (3) any individuals identified by Defendants as possibly having information relevant to this litigation, and any person who may have information rebutting such information.

II. Documents—Rule 26(a)(1)(A)(ii)

Plaintiffs have produced documents Bates-stamped P000001-15012, GAMBA000001-44, DELUIS000001-153, ORLICH000001-41, and CHEN-OSTER000001-692 over the course of this litigation. At the time of these Amended Initial Disclosures, Plaintiffs are not aware of any additional categories of documents in Plaintiffs' possession, custody, or control that may be used to support their claims or defenses.

Plaintiffs reserve the right to identify and use documents from additional categories if, in the course of discovery and investigation relating to this case, they learn that such additional categories contain relevant documents.

Plaintiffs reserve the right to use or rely upon any documents referenced in Defendants' Initial Disclosures or Amended Initial Disclosures, or otherwise made available through discovery in this case.

III. Damages—Rule 26(a)(1)(A)(iii)

Plaintiffs' calculation of damages is the subject of expert analysis that is currently being conducted on a Court-ordered schedule. *See* ECF No. 731 at 2. Plaintiffs therefore respectfully propose that disclosures regarding damages be deferred until the parties complete their analyses pursuant to this schedule.

IV. Insurance—Rule 26(a)(1)(A)(iv)

Plaintiffs possess no relevant insurance agreements.

Dated: November 20, 2020

San Francisco, California

**LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP**

By:/s *Kelly M. Dermody*
Kelly M. Dermody

Kelly M. Dermody (admitted *pro hac vice*)
Anne B. Shaver (admitted *pro hac vice*)
Michael Levin-Gesundheit (admitted *pro hac vice*)
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Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2020, I served a true and correct copy of the foregoing Plaintiffs' Second Amended Initial Disclosures on counsel for Defendants, at the email addresses designated by Defendants for that purpose:

Barbara B. Brown (barbarabrown@paulhastings.com)
Carson H. Sullivan (carsonsullivan@paulhastings.com)
Anna Yoon (annayoon@paulhastings.com)
PAUL HASTINGS LLP
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Washington, DC 20005

Robert J. Giuffra, Jr. (giuffrar@sullcrom.com)
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Ann-Elizabeth Ostrager (ostragerae@sullcrom.com)
Joshua S. Levy (levyjo@sullcrom.com)
SULLIVAN & CROMWELL, LLP
125 Broad Street
New York, NY 10004

By: /s/ Michelle A. Lamy
Michelle A. Lamy

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